

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

IN RE:

WILLIAM J. KEEN
Debtor

: Chapter 7 Case No.
: 13-71705

WILLIAM J. KEEN
Movant

V.

FIRST SENTINEL BANK
Serve: J. Robert Buchanan, Pres./CEO
P.O. Box 1050
Richlands, VA 24641

**And Serve:
Frederick W. Harman, Esq.
201 East Main Street
Tazewell, VA 24651
Counsel for First Sentinel Bank
Respondent**

MOTION TO REDEEM PROPERTY

Now comes your debtor, by counsel, and moves the Court for entry of an order allowing him to redeem property of the estate as described below and as permitted by 11 U. S. C. §722, and as grounds therefor states as follows:

1. Debtor filed a petition under Chapter 13 of the United States Bankruptcy Code on October 21, 2013, which case was later converted to one under Chapter 7 on April 16, 2014.

2. First Sentinel Bank, a creditor of the debtor, claims a security interest in the following personal property of the debtor: (1) 1994 Chevrolet truck (2) 1999 International truck (3) 2006 Pitts log trailer (4) 2006 Imperial dump trailer (5) Ford 5640 farm tractor (6) New Holland round baler (7) 1997 Blondie trailer (8) 1997 Sopko trailer (9) 1991 Kenworth tractor (10) 1985 Daco trailer (11) 2006 Ford F-350 truck (12) 2002 John Deere 650-H crawler dozer with forestry package (13) 1986 International truck with Prentice grapple (14) 1977 International truck (15) 1999 Western Star truck (16) 2003 John Deere 648-G skidder (17) 1997 Prentice D-210-B loader (18) 1989 Mack truck (19) 1999 excavator (20) 1996 Timberjack skidder (21) 2000 Ford Excursion (22) 1972 Load lowboy (23) 1995 Bass Tracker boat and trailer.

3. The value of the items of personal property listed above is no more than thirty five thousand dollars (\$35,000.00), as valued by the debtor based upon his knowledge and condition of the property.

4. The Debtor desires to exercise his right to redeem the personal property listed above from the lien, or liens, if any, of First Sentinel Bank by the payment to the bank of the sum of thirty five thousand dollars (\$35,000.00).

WHEREFORE, your debtor prays that the Court order First Sentinel Bank to release its security interest in the afore described property upon the Debtor's payment to the bank of the sum of thirty five thousand dollars (\$35,000.00), and for such other and further relief as may be just.

NOTICE OF HEARING

PLEASE TAKE NOTICE that on the 22nd day of October, 2014 at 10:00 a.m. the undersigned will move the United States Bankruptcy Court, 180 West Main Street,

Abingdon, Virginia, for entry of an order allowing redemption of the property described in the foregoing motion to redeem.

WILLIAM JONATHAN KEEN
By Counsel

/s/Robert T. Copeland
Robert T. Copeland, VSB #14575
COPELAND LAW FIRM, P.C.
P.O. Box 1296
Abingdon, VA 24212
276-628-9525
276-628-4711 fax
Counsel for Debtor/Movant

CERTIFICATE OF SERVICE

I, Robert T. Copeland, do hereby certify that the foregoing has this 16th day of September, 2014 been filed with the United States Bankruptcy Court, and that true copies of the same have this date been delivered via the Court's ECF system and by first class mail, to Frederick W. Harman, Esq., counsel for creditor, First Sentinel Bank, and to the Chapter 7 Trustee, and by Certified Mail, Return Receipt Requested to First Sentinel Bank through its President and CEO.

/s/Robert T. Copeland